

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE:) Case No. 21-06606
)
Frank Visconti) Chapter 7
)
)
Debtor) Hon. A. Benjamin Goldgar

NOTICE OF MOTION

TO: See attached list

PLEASE TAKE NOTICE that on **August 6, 2021 at 11:00 a.m.**, I will appear before the Honorable A Benjamin Goldgar or any judge sitting in that judge's place, and present the **TRUSTEE'S MOTION TO EXTEND TIME TO FILE OBJECTION TO DISCHARGE PURSUANT TO 11 U.S.C. § 727** a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is 160 817 7512 and the password is 623389. The meeting ID and password can also be found on the judge's page on the court's web site..

If you object to this motion and want it called on the presentment date above, **you must file a Notice of Objection no later than two (2) business days before that date**. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Ilene F. Goldstein, as Trustee
for Frank Visconti:
/s/ Ilene F. Goldstein
One of Her Attorneys

Ilene F. Goldstein
Law Offices of Ilene F. Goldstein, Chartered
950 Skokie Blvd, Suite 211
Northbrook, IL 60062
(847) 562-9595

CERTIFICATE OF SERVICE

I, Ilene F. Goldstein, an attorney, certify] that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on July 26, 2021 before 4:00 p.m.

/s/ Ilene F. Goldstein
Ilene F. Goldstein

SERVICE LIST

U.S. Trustee

Jeffrey L. Gansberg

Office of the U.S. Trustee, Region 11
219 South Dearborn Street
Room 873
Chicago, IL 60604

Via Court's Electronic Notice for Registrants

Debtor's Counsel

David M Siegel

David M Siegel & Assoc
790 Chaddick Drive
Wheeling, IL 60090

Via Court's Electronic Notice for Registrants

Debtor

Via First Class Mail

Frank Visconti

13595 Lucky Lake Drive
Lake Forest, IL 60045

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TRUSTEE'S MOTION TO EXTEND TIME TO FILE OBJECTION TO
DISCHARGE PURSUANT TO 11 U.S.C. § 727

Ilene F. Goldstein, as Chapter 7 Trustee for the Estate of Frank Visconti ("Debtor"), moves this Court for the entry of an order extending the time to File Objection to Discharge Pursuant to 11 U.S.C. § 727 and pursuant to Bankruptcy Rules 4004(b) . In support of this motion the Trustee states as follows:

1. On May 2, 2021 a voluntary petition under Chapter 7 of the United States Bankruptcy Code was filed in the United States Bankruptcy Court for the Northern District of Illinois, Eastern Division.
2. Ilene F. Goldstein is the duly appointed, qualified and acting bankruptcy Trustee for the Bankruptcy Estate of Frank Visconti
- 3 . The docket suggests that this Debtor has filed 8 bankruptcies in the last 25 years.

The Trustee has already requested numerous documents. The Debtor has recently advised the Trustee that some of the documents are unavailable for various reasons which will require the Trustee to in all likelihood file requests under Rule 2004 and issue subpoenas. Further, this is not a simple case as there are numerous business interests. In addition the Debtor resides in a house that he claims not to own for several years that is currently listed

for \$1,599,000.00. The Debtor also has had a RV parked at the house that is a substantial vehicle.

4. Due to the scope of information needed and documentary evidence the Trustee may require, she needs to further and continue her investigation through primary and secondary sources into the Debtor's assets and or interests stated and not stated in the Schedules, before a determination as to whether to object to the Debtor's discharge can be made.

5. Therefore, the Trustee requests that this Court further extend the time for the Trustee to object to Debtor's discharge from August 16, 2021 to December 16, 2021.

WHEREFORE, Ilene F. Goldstein, as Chapter 7 Trustee for the Estate of Frank Visconti, requests the entry of an Order extending the time for the Trustee to file an objection to Debtor's discharge, pursuant to Bankruptcy Rules 4004(b), from August 16, 2021 to December 16, 2021. and for such other and further relief as this Court deems appropriate.

DATED: July 26, 2021

Respectfully submitted,
ILENE F. GOLDSTEIN, as Trustee for
Frank Visconti
By: /s/ Ilene F. Goldstein
One of Her Attorneys

Ilene F. Goldstein
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